



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

April 21, 2008

Reply To
Attn Of: ETPA-088

Ref: 05-023-AFS

Ms. Cornie Hudson, Project Team Leader
St. Joe Ranger District
222 7th Street, Suite 1
St. Marie, ID 83861

Dear Ms. Hudson:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the **Bussel 484 Project** on the Idaho Panhandle National Forest in Idaho. We are submitting comments pursuant to our responsibility under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The Idaho Panhandle National Forest (the Forest) is proposing to manage vegetative resources, provide wood products, work toward full support of designated beneficial uses in the Bussel Creek Watershed, and manage access to provide for multiple uses. The proposed action would treat approximately 2,239 acres within the 14,646 acre project area. The DEIS considers a no-action alternative and two action alternatives:

1. **No Action - Alternative A:** Maintain the existing level of management including fire suppression, road maintenance, recreation use, and previously authorized projects.
2. **Proposed Action - Alternative B:** This alternative would include timber harvest and associated fuels treatment on approximately 2,239 acres. Silvicultural prescriptions include 1,543 acres of commercial thins, 553 acres of group shelterwood cuts, 53 acres of seedtree cuts, and 90 acres of clearcuts with reserves. Road activity would include construction of 5.5 miles of system road, 0.3 miles of temporary road, and 6.7 miles of road reconstruction. An additional 0.2 miles of road would be constructed on Potlatch Corporation lands to facilitate timber harvest on National Forest System (NFS) lands. Access management activities would include providing ATV access to the entire Norton Creek Railroad Grade.
3. **No Road Construction - Alternative C:** Silvicultural prescriptions would be the same as those for Alternative B, but with no new road construction. Approximately 5.4 miles of road would be reconstructed to facilitate timber harvest. Access management activities would include providing ATV access to portions of Norton Creek Railroad Grade.

Both of the action alternatives would result in the decommissioning and storing 29.1 miles of road; planting 367 acres after timber harvest; pocket gopher control on 367 acres; precommercial thinning and pruning on 821 acres; changes in access management; planting some portions of riparian areas in Bear Creek, Little Bear Creek, and other parts of Bussel Creek; placing large woody debris in Bear Creek and Bussel Creek; and correcting two fish migration barriers.

We commend the Forest Service for the inclusive process used in developing the Bussel 484 project. By drawing on watershed assessments, roads analysis, public input, the Forest Plan and other plans the Forest has done an admirable job of crafting a proposal that addresses multiple goals at a landscape scale. We do, however, seek additional information and/or clarification on a limited number of issues. Among these are the need for new road construction in units 233 and 248; access management on the Bussel Creek Trail; the impacts to resources along the Norton Creek and Lines Creek trails under the proposed alternative; and the proposed time line for riparian plantings (10-15 years). These questions are explained in detail in the attached comments. Based on our review, we are rating the DEIS as EC-1 (Environmental Concerns – Adequate). An explanation of this rating is enclosed.

If you have questions or would like to discuss our comments, please contact Teresa Kubo of my staff at (503) 326-2859. Thank you for the opportunity to provide comment.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosure

**EPA Region 10 Detailed Comments
Bussel 484 Project**

Road Construction

The proposed alternative would construct 5.5 miles of new system road, 0.3 miles of temporary road, and reconstruct 6.7 miles of road. The DEIS provides a discussion of the role these roads play in terms of project salability and financial efficiency. It does not, however, include a robust discussion of the criteria used to determine whether newly constructed roads should be temporary or permanent. Further, it is not clear that the preferred harvest system is road dependent in every case. Specifically, it appears that two permanent spur roads would be constructed off of road 758 to access units 248 and 233. In looking at map M5 in Appendix A, it appears that these units could receive ground-based treatment without the proposed road construction.

Recommendations:

- 1) The final EIS (FEIS) should discuss the criteria used to determine whether newly constructed roads should be temporary or permanent.
- 2) Given the existing potential for ground-based extraction, the FEIS should clarify why permanent spur roads NR 14A and NR 14C are needed.

Access Management

The DEIS proposes to shift motorized use away from the northern portion of the project area, thereby reducing sediment impacts to 303(d) listed streams and creating 1,027 wildlife security acres. EPA is fully supportive of this management direction, but we are concerned about the adequacy of the proposed design features to curb illegal use of newly closed routes. Of particular concern is the Bussel Creek trail, where off-trail motorized use has resulted in damage to riparian areas and wet meadows in the Bear Creek area. If areas are to be newly opened to ATV use (such as the Norton Creek Trail), it will be of critical importance to ensure that those areas now proposed for non-motorized use are effectively closed to motorized traffic.

In addition, as noted on page 8, when roads are closed and access is reduced, other areas may experience increased use. The DEIS explores the cumulative impact of this concentrated use on recreation opportunities, but does not include the same level of analysis for impacts to water quality and aquatic and terrestrial habitat. The proposed alternative would concentrate ATV use in areas previously designated as non-motorized. These trails cross and/or parallel several water bodies, including Norton Creek and Lines Creek.

Recommendations:

- 1) In addition to project design feature 8.C (placement of logs, brush and rocks), the FEIS should explore additional design features to deter illegal use of newly closed roads. This may include additional enforcement, signage, public outreach, and permanent barriers.
- 2) The FEIS should analyze potential cumulative impacts to habitat and water quality resulting from increased ATV use in the southwest portion of the project area. This should include a discussion of the extent to which the proposed trails encroach on the streams they parallel.

Riparian Restoration

As noted on page 81, the 1998 Idaho DEQ 303(d) list had Bussel Creek tributaries (Little Bear and Bear Creeks) identified as temperature impaired. The DEIS goes on to note that stream temperatures in both of these streams currently exceed federal and state bull trout temperature standards. The temperature TMDL developed to address these exceedances calls for increasing shade canopy over the stream channels by 20-80% in Bear and Little Bear Creeks. For these reasons we are fully supportive of the riparian planting activity proposed in the action alternatives. We question, however, the extended timeline associated with these planting activities. As noted on page 100, 1.8 miles of Bear and Little Bear Creeks would be planted with native conifers and shrubs over the course of 10 to 15 years. Given current exceedances and the direction in the TMDL, we would encourage the Forest to pursue these planting activities in the near term (or provide the rationale for delaying these plantings).

Recommendation:

- 1) We recommend that the Forest conduct planting activities along Bear and Little Bear Creeks in the near term (sooner than 10 to 15 years out) in support of temperature TMDL implementation.